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Attorneys for Defendant Tenza Trading Ltd.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

CALISTA ENTERPRISES LTD, a
Republic of Seychelles Company,

Plaintiff,

v.

TENZA TRADING LTD., a Cyprus
Company,

Defendant.

No. 3:13-cv-01045-SI

UNOPPOSED MOTION TO EXTEND
EXPERT DEPOSITION DEADLINE

PURSUANT TO LR 16-3

TENZA TRADING LTD., a Cyprus
Company,

Counterclaim Plaintiff,

v.

CALISTA ENTERPRISES LTD, a
Republic of Seychelles Company; and
ALEXANDER ZHUKOV, A
Czechoslovakian citizen,

Counterclaim Defendants.

Tenza Trading Ltd. (hereafter “Tenza”) submits the following unopposed motion.

Local Rule 7-1(a)(1) Certification

The undersigned counsel certifies that the motion at issue is unopposed by counsel for Plaintiff Calista Enterprises Ltd (“Calista”).

Motion

Pursuant to LR 16-3, Tenza requests a brief extension of one business day, from Friday, May 9, 2014, to Monday, May 12, 2014, for completion of expert depositions to accommodate the scheduling of the expert deposition of Calista’s expert Chris Tregillis in Los Angeles, California. This short extension is necessary as there are 6 expert depositions in 6 states that needed to be scheduled. Between the attorneys’ travel time and the schedules of the experts, scheduling of the depositions has been extremely difficult. Because of these difficulties, it became necessary to schedule the deposition of Calista’s expert, Chris Tregillis on Monday, May 12, 2014, one business day after the expert deposition deadline.

This motion is made in good faith and not for purposes of delay. The requested extension

will not require any modifications to any other case management dates that have been set by the Court.

Dated this 9th day of May, 2014.

Respectfully submitted,

s/ Anna M. Vradenburgh

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